By providing separate, staggered pole plate assemblies, the claimed invention makes it much easier to wrap the windings around the individual poles extending therefrom, simplifying assembly of the stator, since adjacent poles do not interfere with the winding. Plunkett does not even remotely suggest this advantage of the claimed invention.

It is true that original claim 5 did not mention separate pieces, as pointed out in paragraph 3 of item 3 on page 2 of the Official Action. However, claim 5 has now been amended to specify "separate" pole plate assemblies, and further to recite that the assemblies are coaxially stacked and staggered, thereby clearly distinguish the stator structure of Plunkett.

Because the Plunkett patent does not disclose or suggest all elements recited in the claim 5 and 7, withdrawal of the rejection under 35 USC §102(b) is respectfully requested.

2. Rejection of Claims 6 and 8-12 Under 35 USC §103(a) in view of U.S. Patent Nos. 4,554,491 (Punkett) and 5,967,763 (Horng)

This rejection is respectfully traversed on the grounds that the Horng patent, like the Plunkett patent, discloses a single pole plate assembly and therefore fails to disclose or suggest a stator made up of separate coaxially-stacked and staggered pole piece assemblies, as recited in claim 5, from which claims 6 and 8-12 depend.

Furthermore, it is respectfully submitted that the engaging member 21 of Horng, which is for connecting a circuit board to a coil seat, does not corresponding to the claimed "engaging member," which is recited in claim 6 as being for assembling the separate pole plate assemblies together to form the multiple pole plate assembly of the stator.

In addition, although the hub 15 of Horng includes an un-numbered groove, the axle 21 to which hub 15 is secured does not include a corresponding second groove as recited in claim 12, or the pins that secure the pole plate assemblies to the engaging member. Instead, the single pole plate assembly 1 of Horng is seated on a ledge of the axle. The reason for grooves on both

the engaging member and the pole plate assemblies is that the grooves and corresponding pins serve to secure the pole plate assemblies at a proper orientation, *i.e.*, at proper angles relative to each other. There is no need for such positioning in the single pole plate stators of Plunkett and Horng.

Because neither Plunkett nor Horng discloses or suggests the claimed multiple pole plate assembly, which facilitates winding of the stator, and furthermore does not disclose or suggest an engaging member for holding the pole plate assemblies together, much less a pin and facing groove structure for securing the pole plate assemblies to the engaging member, withdrawal of the rejection of claims 6 and 8-12 under 35 USC §103(a) is respectfully requested.

Having thus overcome each of the rejections made in the Official Action, expedited passage of the application to issue is requested.

Respectfully submitted,

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